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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**NOTICE OF FILING OF REVISED
PROPOSED ORDER APPROVING
DE MINIMIS ASSET SALE
PROCEDURES MOTION**

Re: Dkt. No. 3575
Date: September 11, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
3 captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title 11 of the
4 United States Code with the United States Bankruptcy Court for the Northern District of California
5 (San Francisco Division) (the “**Bankruptcy Court**”).

6 **PLEASE TAKE FURTHER NOTICE** that on August 16, 2019, the Debtors filed the *Motion*
7 *of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) and Fed. R. Bankr. P. 2002 for Authority to*
8 *Establish De Minimis Asset Sale Procedures* [Docket No. 3575] (the “**Motion**”). A hearing on the
9 Motion is scheduled to be held on **September 11, 2019, at 9:30 a.m. (Pacific Time)** (the “**Omnibus**
10 **Hearing**”) at the Bankruptcy Court in the courtroom of the Honorable Dennis Montali, United States
11 Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden Gate Avenue, San Francisco, California
12 94102.

13 **PLEASE TAKE FURTHER NOTICE** that a proposed form of order with respect to the relief
14 sought therein was attached as Exhibit A to the Motion (the “**Original Proposed Order**”).

15 **PLEASE TAKE FURTHER NOTICE** that on September 4, 2019, the lead plaintiff in the
16 securities class action captioned as *In re PG&E Corporation Securities Litigation*, Case No. 18-03509
17 (the “**Lead Plaintiffs**”) timely filed a limited objection to the Motion [Docket No. 3802].

18 **PLEASE TAKE FURTHER NOTICE** that on September 6, 2019, the Bankruptcy Court
19 issued a tentative ruling on the Motion [Docket No. 3836] (the “**Tentative Ruling**”) in which the
20 Court stated that if the Debtors agreed with the Court’s Tentative Ruling they should revise the
21 Original Proposed Order to be consistent with the Tentative Ruling, obtain approval of the Lead
22 Plaintiffs to the revised form of order, and submit the revised order to the Court for approval, at which
23 time, the Motion would be dropped from the Omnibus Hearing.

24 **PLEASE TAKE FURTHER NOTICE** that, attached hereto as **Exhibit 1-1** and **Exhibit 1-2**,
25 respectively, are copies of the Debtors’ revised proposed order on the Motion (the “**Revised Proposed**
26 **Order**”) and a redline comparison of the Revised Proposed Order against the Original Proposed Order.
27 The Revised Proposed Order incorporates changes that are consistent with the Tentative Ruling, which
28 have been approved by the Lead Plaintiffs, as well as additional informal comments and revisions from
29 various parties, including the Creditors Committee, the Tort Claimants Committee, the California
30 Attorney General’s Office, and certain insurers. Consistent with the Tentative Ruling, the Debtors
31 have, contemporaneously hereto, submitted the Revised Proposed Order to the Bankruptcy Court for
32 approval.

33 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents
34 identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at
35 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
36 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
37 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
38 U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
39 40 Bankruptcy Court’s website.

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1 Dated: September 10, 2019

2 **WEIL, GOTSHAL & MANGES LLP**
3 **KELLER & BENVENUTTI LLP**

4 /s/ Thomas B. Rupp

5 Thomas B. Rupp

6 *Attorneys for Debtors and Debtors in Possession*
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